



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

ICR/AFM/KCB
F. #2018R01047

*271 Cadman Plaza East
Brooklyn, New York 11201*

October 9, 2020

By Email and ECF

James M. Branden
Albert Y. Dayan
Kenneth J. Kaplan
Joel M. Stein
Geoffrey R. Kaiser
Todd D. Greenberg
John S. Wallenstein
Richard D. Willstatter

Re: United States v. Jack Cabasso, et al.
Criminal Docket No. 19-CR-582 (DRH)

Dear Counsel:

On July 10, 2020 and September 17, 2020, Rule 16 discovery was produced to you with Bates numbers that were incorrect and duplicative of earlier Bates numbers in the government's discovery productions. The government is today providing new versions of those files with the correct Bates numbers.

Please see the table below for descriptions of the files provided and their old and corrected Bates numbers.

As a reminder, all of the enclosed material is produced pursuant to the protective order entered in this case on May 29, 2020, and the material that was originally produced on July 10, 2020, as well as today's renumbered re-production of that material, is **designated as Sensitive Discovery Material** pursuant to that order.

Prod. Date	Prior Bates No.	Corrected Bates No.	Records
7/10/20	AVENTURA_0000000288- AVENTURA_0000000361	AVENTURA_0000080288- AVENTURA_0000080361	[Sensitive Discovery Material] - A copy of an affidavit in support of warrants to search electronic accounts, signed May 1, 2019
7/10/20	AVENTURA_0000000362- AVENTURA_0000000432	AVENTURA_0000080362- AVENTURA_0000080432	[Sensitive Discovery Material] - A copy of an affidavit in support of warrants to search physical premises, signed November 6, 2019
7/10/20	AVENTURA_0000000433- AVENTURA_0000000510	AVENTURA_0000080433- AVENTURA_0000080510	[Sensitive Discovery Material] - A copy of an affidavit in support of a warrant to search electronic accounts, signed November 8, 2019
9/17/20	AVENTURA_0000000511	AVENTURA_0000080511	Quickbooks Report - Sales by Customer
9/17/20	AVENTURA_0000000512	AVENTURA_0000080512	Quickbooks Report - Inventory Valuation
9/17/20	AVENTURA_0000000513	AVENTURA_0000080513	Quickbooks Report - Purchases by Vendor
9/17/20	AVENTURA_0000000514	AVENTURA_0000080514	Quickbooks Report - Purchases by Item
9/17/20	AVENTURA_0000000515	AVENTURA_0000080515	Quickbooks Database - Northport Group Inc.QBW
9/17/20	AVENTURA_0000000516	AVENTURA_0000080516	Quickbooks Database - Northport Group.QBW
9/17/20	AVENTURA_0000000517	AVENTURA_0000080517	Quickbooks Database - NORTHPORT REALTY GROUP LLC.04.12.2019 (Backup Sep 09,2019 07 44 AM).QBB
9/17/20	AVENTURA_0000000518	AVENTURA_0000080518	Quickbooks Database - NORTHPORT REALTY GROUP LLC.QBW
9/17/20	AVENTURA_0000000519	AVENTURA_0000080519	Quickbooks Database - SBU_0_Aventura Technologies2017 - Nov 05,2019 01 00 AM.QBB

9/17/20	AVENTURA_0000000520	AVENTURA_0000080520	Quickbooks Database - Northport Group.QBW.TLG
9/17/20	AVENTURA_0000000521	AVENTURA_0000080521	Quickbooks Database - SBU_0_Northport Group Apr 11,2019 01 00 AM.QBB
9/17/20	AVENTURA_0000000522	AVENTURA_0000080522	Quickbooks Database - SBU_0_Northport Group Apr 12,2019 01 00 AM.QBB
9/17/20	AVENTURA_0000000523	AVENTURA_0000080523	Access Database Containing Data from AVENTURA_0000080519

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact us.

Very truly yours,

SETH D. DuCHARME
Acting United States Attorney

By: /s/
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Enclosures

cc: Clerk of the Court (DRH) (by ECF) (without enclosures)